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Of Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Eugene Division

MARTIN G. CHILDS,

Plaintiff,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION;

Defendant.

Case No. 6:20-cv-01610-MK

**PLAINTIFF'S SECOND MOTION FOR
EXTENSION OF TIME TO AMEND
COMPLAINT**

LR 7-1 CERTIFICATION

In compliance with LR 7-1, Plaintiff, by and through his attorney Kevin T. Lafky, attempted to confer with counsel for Defendant but was unable to obtain a position due to pressing nature of this motion.

MOTION

In accordance with Fed. R. Civ. P 6(b) and LR 16-3, Plaintiff respectfully moves this Court for an order extending the deadline for Plaintiff to file Amended Complaint from

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RESPONSE TO AMENDED COMPLAINT**

December 21, 2022 to December 28, 2022. This is Plaintiff's second request for an extension of time to Amend Plaintiff's Complaint. An extension is necessary because Plaintiff's counsel and their office support staff were unable to file the complaint under seal as required for Qui-Tam lawsuits. Additional time is needed to comply with directives to file this complaint under seal. It is counsel's understanding after reviewing the CM/ECF user guide that there would be an option to file the document under seal. However, in the process of attempting to file this document, counsel was never presented with the opportunity to mark this document as sealed. In an abundance of caution, counsel is requesting additional time to ensure the document is filed correctly. The requested extension will not affect any other existing deadlines or trial dates. This motion is made in good faith and not for the purpose of undue delay.

CONCLUSION

For the forgoing reasons, Plaintiff respectfully request that this Court issue an order extending the deadline for Plaintiff to file an Amended Complaint from December 21, 2022 to December 28, 2022.

DATED this 21st day of December, 2022.

/s/ Kevin T. Lafky
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